

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS DEGEN TO INTERROGATORIES OF THE OCA AND  
NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND  
SEATTLE FILMWORKS, INC.  
(NDMS/USPS-T28-22, REDIRECTED FROM WITNESS  
CRUM, AND OCA/USPS-T12-63-64)

The United States Postal Service hereby provides responses of witness Degen to OCA interrogatories OCA/USPSP-T12-63-64 and to Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc. NDMS/USPS-T28-22, redirected from witness Crum. OCA/USPS-T12-65 has been redirected. All questions were filed on September 17, 1997.


Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Eric P. Koetting

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October 1, 1997

Response of United States Postal Service Witness Degen  
to Interrogatories of Office of the Consumer Advocate

OCA/USPS-T12-63. Please refer to your response to OCA/USPS-T12-36. Your response indicated that the SAS log for program MODSPOOL has been filed in LR-H-218. Please provide a reference to the page number of this library reference containing the MODSPOOL program.

OCA/USPS-T12-63 Response.

The SAS log for MODSPOOL is the last one in LR-H-218. In my copy, it follows the SAS log for program NONMODEL. The SAS log for MODSPOOL is eight pages long (the numbering begins with page 1) and the first page contains a handwritten note identifying it as "Program MODSPOOL."

Response of United States Postal Service Witness Degen  
to Interrogatories of Office of the Consumer Advocate

OCA/USPS-T12-64. Please provide an updated or corrected version of your response to OCA/USPS-T12-1 so that it is agreement with your response to TW/USPS-T12-17a.

OCA/USPS-T12-64 Response.

The requested data is provided in Attachments 1 and 2 to this response. To create the revised tables, I moved the REC finance numbers to the MODS office category. This was done by matching the REC finance numbers from Attachment 1 to my response to TW/USPS-T12-17 to finance numbers in the FY 1996 AP 01 Installation Master File. Please note that when I matched the data sets by finance number, I found 52 of the REC finance numbers in the AP 01 Installation Master File. The figure of 51 RECs in my response to Time Warner was based on a comparison of facility names. All 54 REC finance numbers were present in the NORPES data used to estimate employee complements.

Response to OCA/USPS-T12-64 -- Attachment 1  
Revised

Number of BMCs, MODS Offices, and Non-MODS Offices in AP 01 FY 1996  
Includes offices not eligible for IOCS sampling

	CAG A/B	CAG C	CAG D	CAG E	CAG F	CAG G	CAG H	CAG J	Total
BMC	21	0	0	0	0	0	0	0	21
MODS	751	156	24	4	0	0	0	0	935
Non-MOD	324	620	582	1,481	1,886	2,994	3,675	4,849	16,411
Total	1,096	776	606	1,485	1,886	2,994	3,675	4,849	17,367

Total NORPES Offices with Clerk and Mailhandler Employees

	CAG A/B	CAG C	CAG D	CAG E	CAG F	CAG G	CAG H	CAG J	Total
BMC	21	0	0	0	0	0	0	0	21
MODS	614	134	25	5	0	0	0	0	778
Non-MOD	138	586	569	1,507	1,917	3,015	n/a	n/a	7,732
Total	773	720	594	1,512	1,917	3,015	n/a	n/a	8,531

Note: Detail not available for CAG H/J

Response to OCA/USPS-T12-64 -- Attachment 2

Average Number of NORPES Clerks/Mailhandlers for FY 1996 by office group, craft and CAG  
Revised

**BMC'S**

	CAG A/B	CAG C	CAG D	CAG E	CAG F	CAG G	CAG H	CAG J	Total
Clerk-Reg	5,900	0	0	0	0	0	0	0	5,900
Clerk-Sub	1,568	0	0	0	0	0	0	0	1,568
Mailhandl	10,336	0	0	0	0	0	0	0	10,336
Total Cler	17,804	0	0	0	0	0	0	0	17,804

**MODS OFFICES**

	CAG A/B	CAG C	CAG D	CAG E	CAG F	CAG G	CAG H	CAG J	Total
Clerk-Reg	151,808	8,625	873	261	0	0	0	0	161,567
Clerk-Sub	56,750	1,868	206	55	0	0	0	0	58,878
Mailhandl	51,042	776	80	24	0	0	0	0	51,921
Total Cler	259,600	11,268	1,158	339	0	0	0	0	272,366

**NON-MODS OFFICES**

	CAG A/B	CAG C	CAG D	CAG E	CAG F	CAG G	CAG H	CAG J	Total
Clerk-Reg	5,784	18,808	9,748	11,487	5,271	2,889	698	53	54,737
Clerk-Sub	1,455	5,534	3,740	6,770	5,566	6,559	6,052	3,603	39,278
Mailhandl	1,193	954	196	82	6	1	0	0	2,432
Total Cler	8,432	25,296	13,684	18,339	10,842	9,449	6,750	3,655	96,447

Response of United States Postal Service Witness Degen  
to Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle  
Filmworks, Inc.  
(Redirected from Witness Crum)

NDMS/USPS-T28-22

For Base Year 1996, what was the number of direct "handling mail" IOCS tallies which indicated that the clerk or mailhandler was processing Standard A parcels (as opposed to Standard A letters or flats)? Please provide a breakdown of the number of direct "handling mail" IOCS tallies for Standard A parcels into (i) Regular (ii) ECR, (iii) Nonprofit Regular, and (iv) Nonprofit ECR.

NDMS/USPS-T28-22 Response.

Please see my response to DMA/USPS-T28-10 for the requested information.

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.




Carl G. Degen

Date

10-1-97

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Eric P. Koetting

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October 1, 1997